

## **EXHIBIT 1**

### **INTRODUCTION**

Respondent Eveline Ross was a successful candidate for the Inglewood Unified School District Governing Board, in the April 3, 2001 election. Respondent Friends of Eveline Ross (hereinafter, the “Committee”) is the controlled committee of Respondent Eveline Ross. Respondent Eveline Ross acted the treasurer of Respondent Committee.

As a candidate and the controlled committee of a candidate in the April 3, 2001 election, Respondents incurred certain reporting obligations under the Political Reform Act (the “Act”).<sup>1</sup> Respondents failed to timely file two pre-election statements in violation of the campaign reporting provisions of the Act.

For the purposes of this Stipulation, Respondents’ violations of the Political Reform Act are stated as follows:

**COUNT 1:** Respondents failed to timely file a first pre-election campaign statement for the reporting period of January 1, 2001 through February 17, 2001, due on February 22, 2001, in violation of section 84200.5, subdivision (c) of the Government Code.

**COUNT 2:** Respondents failed to timely file a second pre-election campaign statement for the reporting period of February 18, 2001 through March 17, 2001, due on March 22, 2001, in violation of section 84200.5, subdivision (c) of the Government Code.

**RESPONDENTS:** Eveline Ross, Friends of Eveline Ross

### **SUMMARY OF THE LAW**

An express purpose of the Act, as set forth in Section 81002, subdivision (a), is to assure that the contributions and expenditures affecting election campaigns are fully and truthfully disclosed to the public, so that voters will be better informed, and so that improper practices will be inhibited. The Act therefore establishes a campaign reporting system designed to accomplish this purpose of disclosure.

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<sup>1</sup> The Political Reform Act is contained in sections 81000 through 91014 of the Government Code. All statutory references are to the Government Code unless otherwise indicated. The regulations of the Fair Political Practices Commission, enacted pursuant to the provisions of the Act, are contained in sections 18000, *et seq.*, of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

Section 84200.5 requires candidates and their controlled committees to file two pre-election campaign statements, disclosing contributions received and expenditures made before the election in which the candidate seeks office. Section 84200.8 sets forth the pre-election filing schedule for elections held in odd-numbered years. Pursuant to Section 84200.8, the first pre-election campaign statement must be filed no later than 40 days before the election, covering the reporting period ending 45 days before the election. The second pre-election campaign statement must be filed no later than 12 days before the election, for the reporting period ending 17 days before the election.

### **SUMMARY OF THE FACTS**

Respondent Eveline Ross was a successful candidate for the Inglewood Unified School District Governing Board, in the April 3, 2001 election. Friends of Eveline Ross (hereinafter, the “Committee”) is the controlled committee of Respondent Eveline Ross. Respondent Ross acted as her Committee’s treasurer. From January 1, 2001 through April 17, 2001, Respondents reported receiving contributions of \$5,800 and making expenditures of \$5,800.

#### **Counts 1 - 2: Failure to file two pre-election campaign statements, in violation of Section 84200.5.**

Respondents were required to file a first pre-election campaign statement by February 22, 2001, for the reporting period of January 1, 2001 through February 17, 2001. On March 24, 2001, the Los Angeles Registrar-Recorder/County Clerk received Respondents first pre-election statement, however most of information that was required to be on the statement was missing. On March 26, and March 28, 2001, Irene Soot of the Los Angeles Recorder-Registrar/County Clerk left telephone messages for Respondent Ross at home and at work, regarding the first pre-election campaign statement. On April 5, 2001, Ms. Soot spoke with Respondent Ross, and advised her that most of the information that was required to be on the statement was missing, and that the statement was “still considered outstanding as the statement was very incomplete.” Respondent Ross stated that she would find her copy of the statement and re-file it immediately. On April 25, 2001, Ms. Soot again spoke with Respondent Ross, and reminded her that her first filing was still incomplete. Ms. Soot also advised Respondent Ross that a second pre-election statement had also now become overdue. Respondent Ross stated that she would “work on everything this weekend and get it in.” On May 31, 2001, Respondents filed the first pre-election statement. The statement was filed three months late and almost two months after the election.

Respondents were required to file a second pre-election campaign statement by March 22, 2001, for the reporting period of February 18, 2001 through March 17, 2001. In addition to advising Respondent Ross on April 25, 2001, that the second pre-election statement was past due, Ms. Soot sent written notices to Respondents on March 26, 2001, and April 10, 2001, advising them that the second pre-election statement was past due. Respondents filed the second pre-election statement on May 31, 2001, two months after the election.

Respondents' failure to timely file two pre-election campaign statements constitutes two violations of Section 84200.5.

### **CONCLUSION**

This matter consists of two counts, which carry a maximum possible administrative penalty of ten thousand dollars (\$10,000). The typical administrative penalty for failing to timely file a pre-election campaign statement is \$1,000 to \$1,500 per count. Here, despite numerous requests, Respondents did not timely file their statements. When advised that the first pre-election statement, which Respondents first attempted to file over a month late, would not be accepted as it was missing most of the required information, Respondents waited two additional months to re-file their first pre-election statement. The facts of this case, including the relatively small amount of money involved in Respondents' campaign, justify imposition of the agreed upon penalty of two thousand five hundred dollars (\$2,500).